

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

In Re:	Case No.: 22-10662-BFK
BV MANAGEMENT LLC,  Debtor.	Chapter 7

**PRECAUTIONARY RESPONSE OF CEDAR GLADE CAPITAL  
REGARDING TRUSTEE’S FINAL REPORT**

CEDAR GLADE CAPITAL LP (“CGC”), files this response, on a precautionary basis, with respect to: (1) the Trustee’s Final Report (the “TFR”) [ECF 529]; (2) the Objection to the Final Report (the “Objection”) filed by G2 BVM, LLC and The Fred R. Gumbinner Living Trust (the “G2 Creditors”) [ECF 533]; and (3) the Trustee’s Response to the Objection (the “Reply”) [ECF 534].

To the extent the TFR is not approved at the hearing on June 10, 2025, CGC respectfully submits that allowance of Claim Nos. 8 and 9 should be litigated in a procedurally appropriate forum. Allowance of such claims would have a substantial pecuniary impact on general unsecured creditors like CGC, and the June 10 hearing provides creditors with inadequate notice and opportunity to respond. CGC hereby reserves all rights with respect to the claims of the G2 Creditors.

*[Signature on Following Page]*

Respectfully Submitted,

Dated: June 9, 2025

By: /s/ Maurice B. VerStandig  
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*Counsel for Cedar Glade Capital LP*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of June, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig